

STIP

GABRIEL L. GRASSO, ESQ.
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UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MANUEL PEREZ,

Defendant.

Case No.: 2:13-cr-00365-JAD-CWH

STIPULATION TO CONTINUE
MOTION TO MODIFY CONDITIONS
OF RELEASE HEARING

(FIRST REQUEST)

Certification: This stipulation is filed pursuant to General Order 2007-04.

IT IS STIPULATED between the defendant MANUEL PEREZ (PEREZ) through his attorney GABRIEL L. GRASSO, ESQ. and the United States of America, through SUSAN CUSHMAN, Assistant United States Attorney, that the unopposed motion to modify conditions of release hearing currently scheduled for July 11, 2014, at the hour of 9:00 a.m., be vacated and set to a date and time convenient to this court.

1. Defense counsel will be out of the jurisdiction on Friday, July 11 and Monday, July 14, 2014.

2. The defendant does not have an objection to this continuance.

3. The parties request a reset hearing sometime on or after July 15, 2014

DATED this 8th day of July, 2014.

RESPECTFULLY SUBMITTED BY:

/s/ Susan Cushman
SUSAN CUSHMAN
Assistant United States Attorney

/s/ Gabriel L. Grasso
GABRIEL L. GRASSO
Attorney for Defendant

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FINDINGS OF FACT

Based upon the submitted Stipulation, and good cause appearing therefore, the Court finds that:

1. Defense counsel will be out of the jurisdiction on Friday, July 11, 2014.
2. The defendant is not incarcerated and does not object to the continuance.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would result in a miscarriage of justice.
2. For all of the above stated reasons, the ends of justice would best be served by a continuance of the hearing date.

ORDER

IT IS ORDERED that the unopposed motion to modify conditions of release hearing currently scheduled for July 11, 2014, at the hour of 9:00 a.m., be vacated and continued to Thursday, July 24, 2014, at 11:00 a.m.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: July 9, 2014.